

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-2(c)

FEITLIN, YOUNGMAN, KARAS
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In Re:

ELIZABETH SUAREZ,

Debtor.

Case No.: 11-33438-NLW

Judge: Hon. Novalyn L. Winfield

Chapter: 13

Hearing Date: September 6, 2011 at 9:00 a.m.

**NOTICE OF MOTION TO VACATE AUTOMATIC STAY WITH PROSPECTIVE
RELIEF**

PLEASE TAKE NOTICE that on September 6, 2011, at 9:00 a.m., or as soon thereafter as counsel may be heard, the undersigned attorneys for the landlord, Donna Calabrese, will make an application before the Honorable Novalyn L. Winfield, United States Bankruptcy Judge, at the United States Bankruptcy Court, 50 Walnut Street, Newark, New Jersey 07102, for an entry of an Order pursuant to 11 U.S.C. § 362(d) for the following:

1. Vacating the Automatic Stay so as to permit landowner, Donna Calabrese, to proceed with the eviction of debtor from 4 Taryn Court, Woodcliff Lake, New Jersey.
2. Requesting that any automatic stays in connection with any future Bankruptcy Petitions which are filed by this debtor and/or this debtor's husband, Joseph Suarez, shall not impede the foreclosure proceedings, unless specifically ordered by a bankruptcy court judge.
3. For reimbursement of its attorneys fees and costs of this motion.

PLEASE TAKE FURTHER NOTICE that in support of this motion, the undersigned shall rely upon the attached Certification of Donna Calabrese.

The nature of the relief requested does not require that briefs be submitted as no real complex issues of law are contemplated, pursuant to D.N.J. LBR 9013-2.

PLEASE TAKE FURTHER NOTICE that pursuant to Rule 3 of the Local Bankruptcy Rules, failure to file a response to the within Motion or to appear before the Court in opposition to same, the requested relief may be granted by the Court without further notice.

FEITLIN, YOUNGMAN, KARAS
& GERSON, LLC
Attorneys for Donna Calabrese

By: /s/ Kathy Karas-Pascuicco

Kathy Karas-Pascuicco

Dated: August 10, 2011

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